



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARREN HUNG LE and
CHRIS BOULOS,

Defendants.

No. 8:22-cr-00089-RGK

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute MDMA; 21 U.S.C. §§ 841(a)(1), (b)(1)(C): Possession with Intent to Distribute MDMA; 18 U.S.C. § 924(c)(1)(A)(i): Possession of a Firearm in Furtherance of a Drug Trafficking Crime]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown, and continuing through on or about March 5, 2020, in Orange and Los Angeles Counties, within the Central District of California, and elsewhere, defendants DARREN HUNG LE and CHRIS BOULOS conspired with each other and others known and unknown

1 to the Grand Jury to knowingly and intentionally distribute and
2 possess with intent to distribute 3,4-Methylenedioxymethamphetamine
3 ("MDMA"), a Schedule I controlled substance, in violation of Title
4 21, United States Code, Sections 841(a)(1), (b)(1)(C).

5 B. MANNER AND MEANS OF THE CONSPIRACY

6 The objects of the conspiracy were to be accomplished, in
7 substance, as follows:

8 1. Defendant LE would solicit from defendant BOULOS the names
9 and mailing addresses of people to whom defendant LE could direct
10 shipments of MDMA.

11 2. Defendant LE would order shipments of MDMA from drug
12 distributors, including drug distributors located outside the United
13 States, and would direct that the shipments be delivered to the
14 mailing addresses provided by defendant BOULOS.

15 3. Defendant LE would coordinate with defendant BOULOS as to
16 when and where the shipments of MDMA would be delivered.

17 4. Defendant BOULOS would pick up the shipments of MDMA from
18 the mailing addresses to which defendant LE had directed the
19 shipments.

20 5. Defendant BOULOS would coordinate with defendant LE as to
21 when and where defendant BOULOS would deliver the shipments of MDMA
22 to defendant LE for the purpose of further distribution to drug
23 customers.

24 C. OVERT ACTS

25 In furtherance of the conspiracy and to accomplish the objects
26 of the conspiracy, defendants LE and BOULOS, and others known and
27 unknown to the Grand Jury, committed various overt acts within the
28

1 Central District of California, and elsewhere, including, but not
2 limited to, the following:

3 Overt Act No. 1: On October 19, 2019, using encrypted
4 electronic communications, defendant LE asked defendant BOULOS
5 whether defendant BOULOS obtained an additional address to which
6 defendant LE could direct a shipment of MDMA.

7 Overt Act No. 2: On October 19, 2019, using encrypted
8 electronic communications, defendant BOULOS responded to defendant LE
9 that he had obtained an additional address to which defendant LE
10 could direct a shipment of MDMA.

11 Overt Act No. 3: On November 7, 2019, using encrypted
12 electronic communications, defendants LE and BOULOS discussed a
13 United States Postal Service ("USPS") shipment that defendant LE had
14 directed to be shipped to an address provided by defendant BOULOS.

15 Overt Act No. 4: On November 9, 2019, using encrypted
16 electronic communications, defendant LE informed defendant BOULOS
17 that the USPS shipment would be arriving that day.

18 Overt Act No. 5: On November 9, 2019, using encrypted
19 electronic communications, defendant BOULOS confirmed that he took
20 possession of the shipment that defendant LE had told him would be
21 arriving that day.

22 Overt Act No. 6: On November 17, 2019, in response to an
23 inquiry from defendant LE regarding the availability of an address
24 for shipments, defendant BOULOS confirmed, using encrypted electronic
25 communications, that the address was still available and resent
26 defendant LE a name and address of a residential apartment unit on
27 North Kingsley Drive in Los Angeles, California (the "North Kingsley
28 Residence").

1 Overt Act No. 7: On November 19, 2019, in response to
2 defendant LE's request for another name and address, defendant BOULOS
3 informed defendant LE, using encrypted electronic communications,
4 that defendant LE could use defendant BOULOS's address on Ferrari
5 Lane in Garden Grove, California (the "Ferrari Residence").

6 Overt Act No. 8: On November 19, 2019, using encrypted
7 electronic communications, defendant LE sent defendant BOULOS two
8 photographs and a video showing multiple clear plastic bags
9 containing orange pills stamped "CP" and "TESLA" that were consistent
10 with MDMA pills. After sending the pictures and video, LE told
11 BOULOS over encrypted electronic communications that "This the real
12 money maker" and "7k a boat to you."

13 Overt Act No. 9: On November 19, 2019, using encrypted
14 electronic communications, defendant BOULOS asked how much he should
15 make off selling MDMA, and LE responded "U should make about 250-1k,"
16 "Per boat," "Depending on the buyers."

17 Overt Act No. 10: On November 25, 2019, using encrypted
18 electronic communications, defendant LE informed defendant BOULOS
19 that defendant LE ordered additional shipments to the North Kingsley
20 Residence and the Ferrari Residence.

21 Overt Act No. 11: On December 13, 2019, using encrypted
22 electronic communications, defendant LE informed defendant BOULOS
23 that one or both of the shipments to the North Kingsley Residence and
24 the Ferrari Residence were "in customs."

25 Overt Act No. 12: On December 14, 2019, using encrypted
26 electronic communications, defendant LE informed defendant BOULOS
27 that the shipment directed to the North Kingsley Residence would be
28 "coming next week."

1 Overt Act No. 13: On December 23, 2019, using encrypted
2 electronic communications, defendant LE sent defendant BOULOS a
3 screenshot of a shipment update reflecting that a parcel had been
4 "delivered to an individual at the address at 7:36 am on December 23,
5 2019 in Los Angeles, CA 90004" (the North Kingsley Residence).

6 Overt Act No. 14: On December 23, 2019, using encrypted
7 electronic communications, defendant BOULOS confirmed that he had
8 picked up the parcel and coordinated delivering the parcel to
9 defendant LE.

10 Overt Act No. 15: On January 7, 2020, using encrypted
11 electronic communications, defendant BOULOS informed defendant LE
12 that a shipment ordered to be shipped to the Ferrari Residence in
13 November 2019, had not arrived.

14 Overt Act No. 16: On January 7, 2020, in response to a request
15 from defendant LE for additional names and addresses, defendant
16 BOULOS, using encrypted electronic communications, sent defendant LE
17 two additional names and addresses and informed defendant LE that
18 defendant LE could send an additional shipment to the North Kingsley
19 Residence.

20 Overt Act No. 17: On January 29, 2020, using encrypted
21 electronic communications, defendant LE told defendant BOULOS that he
22 would pick up a package from defendant BOULOS's home after defendant
23 BOULOS picked up the package from the recipient's address.

24 Overt Act No. 18: On January 29, 2020, using encrypted
25 electronic communication, defendant LE instructed defendant BOULOS to
26 remove the shipment labels and burn the packaging of a shipment that
27 arrived, stating "I need u to do my method," "Rip off all the
28 stickers and shut and burn it."

1 Overt Act No. 19: On February 8, 2020, using encrypted
2 electronic communications, defendant LE informed defendant BOULOS
3 that a shipment would be delivered to the North Kingsley Residence
4 the same day or the following day.

5 Overt Act No. 20: On February 9, 2020, using encrypted
6 electronic communications, defendant LE informed defendant BOULOS
7 that the parcel was at the post office after an unsuccessful delivery
8 attempt at the North Kingsley Residence.

9 Overt Act No. 21: On February 9, 2020, using encrypted
10 electronic communications, defendant BOULOS sent a photograph of
11 himself moving a large box on a dolly at the post office to defendant
12 LE in order to confirm that he had picked up the parcel from the post
13 office.

14 Overt Act No. 22: On or about February 21, 2020, defendant LE
15 arranged the shipment of approximately 25,380 MDMA pills, weighing
16 approximately 12.5 kilograms, concealed within an automotive exhaust
17 system part.

18 Overt Act No. 23: On February 23, 2020, using encrypted
19 electronic communications, defendant LE informed defendant BOULOS
20 that defendant LE had directed shipments to the North Kingsley
21 Residence and one additional address that defendant BOULOS had
22 provided defendant LE.

23 Overt Act No. 24: On February 23, 2020, using encrypted
24 electronic communications, defendant LE instructed defendant BOULOS
25 to send defendant LE additional names and addresses of people that
26 defendant BOULOS trusted.

27 Overt Act No. 25: On March 5, 2020, at the North Kingsley
28 Residence, defendant BOULOS accepted a parcel that defendant LE had

1 directed to that address, using the name of one of the residents of
2 the North Kingsley Residence to sign for the parcel.

3 Overt Act No. 26: On March 5, 2020, using encrypted electronic
4 communications, defendant BOULOS informed defendant LE of the arrival
5 of the shipment defendant LE had directed to the North Kingsley
6 Residence.

7 Overt Act No. 27: On March 5, 2020, using encrypted electronic
8 communications, defendant LE instructed defendant BOULOS to look for
9 law enforcement surveillance as defendant BOULOS transported the
10 parcel from the North Kingsley Residence to the Ferrari Residence,
11 stating "be extra careful please watch for cars following," and "they
12 won't be directly behind u."

13 Overt Act No. 28: On March 5, 2020, defendant BOULOS
14 transported the parcel by car from the North Kingsley Residence to
15 the Ferrari Residence.

16 Overt Act No. 29: On March 5, 2020, defendant LE instructed
17 defendant BOULOS to tear off all the stickers on the packaging of the
18 parcel and burn the packaging.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about March 5, 2020, in Orange County, within the Central District of California, defendants DARREN HUNG LE and CHRIS BOULOS, each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

[DEFENDANT LE]

On or about February 21, 2021, in Orange County, within the Central District of California, defendant DARREN HUNG LE knowingly and intentionally possessed with intent to distribute 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance.

COUNT FOUR

[18 U.S.C. § 924(c) (1) (A) (i)]

[DEFENDANT LE]

On or about February 21, 2021, in Orange County, within the Central District of California, defendant DARREN HUNG LE knowingly possessed firearms, namely, a Glock, Model 43, 9mm pistol, bearing serial number BLPT659, and a Glock, Model 22, .40 caliber pistol, bearing serial number FFX737, in furtherance of a drug trafficking crime, namely, possession with intent to distribute 3,4-

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1 Methylenedioxymethamphetamine ("MDMA"), in violation of Title 21,
2 United States Code, Sections 841(a)(1), (b)(1)(C), as charged in
3 Count Three of this Indictment.

4
5 A TRUE BILL

6 /s/

7 _____
Foreperson

8 TRACY L. WILKISON
9 United States Attorney

10 

11 SCOTT M. GARRINGER
12 Assistant United States Attorney
Chief, Criminal Division

13 BENJAMIN R. BARRON
14 Assistant United States Attorney
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15 GREGORY S. SCALLY
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